

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

IN RE:

RAYMOND WILLIAMS,
Debtors.

CASE NO.: 07-32566-JDL
Chapter 13

**MOTION TO ALLOW FOR SUBSTITUTION OF COLLATERAL, OR IN THE
ALTERNATIVE, TO DIRECT INSURANCE PROCEEDS TO BE
PAID TO DIRECTLY TO THE DEBTORS, AND/OR TO DELETE VEHICLE
AND VEHICLE PAYMENT FROM PLAN**

COMES NOW Raymond Williams (the "Debtor"), by and through counsel, to
move this Honorable Court in the following particulars:

1. Your debtor had a 2000 Chevrolet Blazer included in the plan for payment.

The lien holder is Budget Auto Sales.

2. The debtor's vehicle was involved in an accident on or about June, 2009. The debtor's vehicle was deemed a total loss by the insurance company.

3. Your debtor seeks to be allowed to use the insurance proceeds to substitute collateral. The proceeds are expected to be in the amount of \$3950.00.

4. In the alternative, your debtor seeks to have the insurance proceeds to be paid directly to him, so he may obtain transportation.

5. In addition, and in the alternative, your debtor seeks to have the plan modified to delete the secured claim and payment for the lien holder, and the insurance charge from the plan, so that the payments may be reduced.

WHEREFORE, PREMISES CONSIDERED, IT IS PRAYED:

1. For a hearing on the above requests by the debtor;

2. For such further and other relief as to which the debtor may be entitled.

/s/ Ted I. Jones

Ted I. Jones, #11017
Suite 1928
100 North Main Building
Memphis, Tennessee 38103
Telephone: (901) 526-4249
Facsimile: (901) 525-4312
Email: Dtedijones@aol.com

Attorney for the Debtor

CERTIFICATE OF SERVICE

I hereby certify that on this the 2nd day of September, 2009, a copy of the foregoing electronically filed motion was served on the parties listed below by first-class mail, postage prepaid, unless said party is a registered CM/ECF participant who has consented to electronic notice, and the Notice of Electronic Filing indicates that Notice was electronically mailed to said party.

Chapter 13 Trustee
Budget Auto Sales, c/o David Drexler, Esq.
Priority Insurance

/s/ Ted I. Jones

Ted I. Jones